

EXHIBIT A



IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

US DOMINION, INC., DOMINION)	
VOTING SYSTEMS, INC., and)	
DOMINION VOTING SYSTEMS)	
CORPORATION,)	C.A. No. N21C-03-257 EMD
)	
Plaintiffs,)	
)	
v.)	
)	
FOX NEWS NETWORK, LLC,)	
)	
Defendant.)	

**STIPULATION AND [PROPOSED] ORDER REGARDING PRODUCTION
OF EXPERT REPORT BY DR. J. ALEX HALDERMAN**

WHEREAS, an expert report by Dr. J. Alex Halderman (the “Halderman Report” or “Report”) was submitted on July 1, 2021, by the plaintiffs in *Curling, et al. v. Raffensperger, et al.*, No. 1:17-cv-02989-AT (“*Curling*”), a lawsuit pending in the United States District Court for the Northern District of Georgia (the “Georgia Court”);

WHEREAS, the Georgia Court has entered a protective order in *Curling* that designates the Halderman Report as “Attorneys’ Eyes Only” and requires that it be kept under seal;

WHEREAS, Fox News Network, LLC (“FNN”) has moved to intervene in *Curling* for the limited purpose of obtaining a copy of the Halderman Report;

WHEREAS, Dominion has filed an opposition to FNN’s motion to intervene in

that case;

WHEREAS, Dominion has obtained redacted and unredacted copies of the Halderman Report with the Georgia Court's permission; and

WHEREAS, Dominion does not oppose FNN obtaining redacted and unredacted copies of the Halderman Report for use in this litigation subject to FNN's adherence to all confidentiality obligations of the Georgia Court and this Court.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by the parties hereto, subject to the approval of the Court, that:

1. Dominion agrees to produce redacted and unredacted copies of the Halderman Report to FNN, upon approval of the Georgia Court, and consistent with whatever conditions (if any) are imposed by the Georgia Court, while fully reserving its right to argue that the Halderman Report is irrelevant to the claims and defenses at issue in this matter and inadmissible at trial;
2. Dominion shall produce redacted and unredacted copies of the Halderman Report to FNN within 7 days of any order or other action by the Georgia Court authorizing Dominion's production of the Halderman Report to FNN;
3. Dominion agrees to withdraw its opposition to FNN's motion to intervene in the *Curling* litigation, solely for the purpose of seeking the Georgia Court's authorization to obtain a copy of the Halderman Report;
4. The parties agree to designate the Halderman Report "Highly Confidential—

Attorneys' Eyes Only" under the Protective Order in this matter.

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Dated: May 6, 2022

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IT IS SO ORDERED on this 6 day of May, 2022.



Special Master John A. Elzufon